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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 STEPHEN SCHAAF, on behalf of  
14 himself and all others similarly  
15 situated,

16 Plaintiff,

17 v.

18 NELLIS AUCTION HOLDINGS,  
19 LLC, a domestic limited liability  
20 company; CRET LLC a/k/a NELLIS  
21 AUCTION, a domestic limited  
22 liability company; NELLIS  
23 AUCTION ARIZONA LLC, a  
24 foreign limited liability company;  
25 NELLIS AUCTION COLORADO,  
26 LLC, a foreign limited liability  
27 company; NELLIS AUCTION NEW  
28 JERSEY, LLC, a foreign limited  
liability company; NELLIS  
AUCTION TEXAS, LLC, a foreign  
limited liability company; and  
DOES 1 through 50, inclusive,

Defendants.

Case No. 25-cv-00647-JCM-NJK

**STIPULATION TO EXTEND RESPONSE  
AND REPLY DEADLINES ON  
DEFENDANTS' MOTION TO DISMISS  
[ECF 11]**

**(FIRST REQUEST)**



1 IT IS HEREBY STIPULATED by and between the parties, through their  
2 respective counsel, that (1) Plaintiff Stephen Schaaf, on behalf of himself and all  
3 others similarly situated, shall have up to one additional week until Monday, June 30,  
4 2025, to respond to Defendants' Motion to Dismiss Non-Employer Defendants With  
5 Prejudice (ECF No. 11) ("Motion"), and that (2) Defendants shall have up to one  
6 additional week until Monday, July 14, 2025, to file a reply in support of the Motion.

7 This Stipulation is submitted and based on the following:

8 1. Plaintiff's Complaint was filed on April 10, 2025. (ECF No. 1.)

9 2. All named Defendants were served between April 29, 2025, and May 8,  
10 2025. (ECF Nos. 5-10.)

11 3. On May 5, 2025, Defendants' counsel requested a three-week extension  
12 to respond to Plaintiff's Complaint until June 2, 2025, to which Plaintiff's counsel  
13 agreed.

14 4. On May 22, 2025, Defendants' counsel requested an additional extension  
15 until the later of June 9, 2025, or the date a responsive pleading would be due from  
16 the last-served entity. Plaintiff's counsel again agreed.

17 5. On June 9, 2025, Defendants filed their Motion to Dismiss Non-  
18 Employer Defendants With Prejudice. The Motion includes seven (7) exhibits and  
19 totals 50 pages altogether. (ECF No. 11.)

20 6. Plaintiff's response to the Motion is due to be filed on June 23, 2025.

21 7. Given the length and complexity of Defendants' Motion, as well as its  
22 reliance on extrinsic exhibits, Plaintiff needs additional time to fully and adequately  
23 respond to the Motion.

24 8. Defendants have agreed to allow Plaintiff an additional week to respond  
25 to the Motion until Monday, June 30, 2025.

26 9. Plaintiff has agreed to allow Defendants an additional week to file a reply  
27 in support of their Motion until Monday, July 14, 2025.

28 10. This is the parties' first request for an extension on the response and reply

1 deadlines on Defendants' Motion.

2 11. This request is made in good faith and not for the purpose of delay.

3  
4 Dated this 23rd day of June, 2025.

5 RAFII & ASSOCIATES, P.C.

HONE LAW

6  
7 /s/ Jason Kuller

/s/ Jennifer Arledge (w/permission)

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*CRET LLC A/K/A NELLIS AUCTION,*

*NELLIS AUCTION ARIZONA, LLC, NELLIS*

*AUCTION COLORADO, LLC, NELLIS*

*AUCTION NEW JERSEY LLC, AND NELLIS*

*AUCTION TEXAS, LLC*

16 **ORDER**

17 **IT IS SO ORDERED.**

18  
19   
**UNITED STATES DISTRICT JUDGE**

20  
21 **Dated:** June 25, 2025



**CERTIFICATE OF SERVICE**

I hereby certify that on the date shown file stamped above, I served a true and correct copy of the foregoing pleading on all registered parties with the Court's electronic filing system.

/s/ Jason Kuller

Jason Kuller

Of Counsel

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